

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

VALENE REED, individually and on	)	
behalf of all others similarly situated,	)	Civil Action No. 10-cv-5642 (DLC)
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
CONTINENTAL GUEST SERVICES	)	Filed Electronically
CORPORATION,	)	
	)	
Defendant.	)	
	)	

**DECLARATION OF R. BRUCE CARLSON IN SUPPORT OF MOTION  
FOR AWARD OF ATTORNEYS' FEES, REIMBURSEMENT OF EXPENSES  
AND PAYMENT OF PLAINTIFF'S INCENTIVE AWARD**

I, R. Bruce Carlson, hereby state under penalty of perjury as follows:

1. I am a partner in the law firm of Carlson Lynch Ltd. I submit this Declaration in support of an application for an award of attorneys' fees and reimbursement of expenses, and payment of a plaintiff's incentive award, in connection with services rendered to the plaintiff's settlement class by Carlson Lynch Ltd. and Calihan Law PLLC.
2. The compensation for the services rendered by these firms in this case has been wholly contingent on the success of this litigation.
3. Attached hereto as Exhibit A is a spreadsheet reflecting the hours spent by my firm working on this case from inception through November 9, 2011, and an estimate of time since that date through the hearing on the motion for final approval of the settlement. Attached hereto as Exhibit B is list of unreimbursed expenses my firm has incurred in connection with the

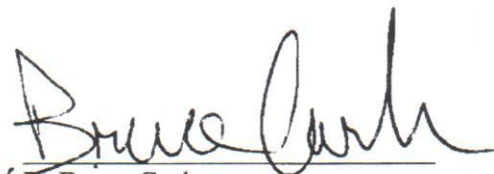
prosecution of this action. These expenses are reflected in the books and records of this firm maintained in the ordinary course of business. These books and records are prepared from expense vouchers and check records and are an accurate record of the expenses incurred.

4. Attached hereto as Exhibit C is a spreadsheet reflecting the hours spent by Calihan Law PLLC working on this case from inception through November 9, 2011, and an estimate of time since that date through the hearing on the motion for final approval of the settlement. Exhibit C also includes a list of unreimbursed expenses Calihan Law PLLC has incurred in connection with the prosecution of this action. These expenses are reflected in the books and records of the firm maintained in the ordinary course of business. These books and records are prepared from expense vouchers and check records and are an accurate record of the expenses incurred.

5. All of the hours reflected in the attached spreadsheets were reasonable and necessary to the prosecution of this case.

6. None of the time included in Class Counsel's fee application is for any work that has been done in connection with the application for fees.

I declare under penalty of perjury that the foregoing is true and correct, this 10th day of November, 2011.



R. Bruce Carlson

# **EXHIBIT A**

**Firm Name:**  
**Carlson Lynch LTD**

**Reed v. Continental Guest Services**

**Time Report**

Case Inception Through 11/9/2011

**Categories:**

- |   |  |                |
|---|--|----------------|
| 1. Investigations, Factual Research, Initial Complaint                  | 4. Court appearances                                 | (P) Partner    |
| 2. Discovery  | 5. Settlement  | (A) Associate  |
| 3. Pleadings, Briefs and Pretrial Motions<br>(Including Legal Research) | 6. Litigation Strategy, Analysis and Case Management | (PL) Paralegal |

ATTORNEY OR PARALEGAL	1	2	3	4	5	6	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
R. Bruce Carlson (P)	11.00		34.75	4.00	32.00	45.25	127.00	\$500.00	\$63,500.00
Gary F. Lynch (P)					12.00	2.50	14.50	\$500.00	\$7,250.00
Stephanie K. Goldin (A)	4.00		28.50		13.50		46.00	\$250.00	\$11,500.00
Elaine McFarland (PL)	3.50		2.00			6.00	11.50	\$100.00	\$1,150.00
<b>TOTALS:</b>	<b>18.50</b>	<b>0.00</b>	<b>65.25</b>	<b>4.00</b>	<b>57.50</b>	<b>53.75</b>	<b>199.00</b>		<b>\$83,400.00</b>

# **EXHIBIT B**

<b>Firm Name:</b> <b>Carlson Lynch LTD</b>	<b><u>Reed v. Continental Guest Services</u></b> <b><u>Expense Report</u></b>	
	Case Inception Through 11/9/2011	
<b>Travel, Parking and Meals</b> <b>Website Notice</b>		2,608.46
		65.00
<b>Total</b>		2,673.46

# **EXHIBIT C**



**Firm Name:**  
**Calihal Law PLLC**

**Reed v. Continental**  
**Time Report**

Case Inception Through 3/16/2011

**Categories:**

- |   |  |                |
|---|--|----------------|
| 1. Investigations, Factual Research, Initial Complaint                  | 4. Court appearances                                 | (P) Partner    |
| 2. Discovery  | 5. Settlement  | (A) Associate  |
| 3. Pleadings, Briefs and Pretrial Motions<br>(Including Legal Research) | 6. Litigation Strategy, Analysis and Case Management | (PL) Paralegal |

ATTORNEY OR PARALEGAL	1	2	3	4	5	6	TOTAL HOURS	CURRENT HOURLY RATE	TOTAL LODESTAR
Rob Calihan (P)	3.80	0.00	5.80	4.00	4.90	41.20	59.70	\$500.00	\$29,850.00
Marilyn Springer (PL)						7.50	7.50	\$150.00	\$1,125.00
<b>TOTALS:</b>	<b>3.80</b>	<b>0.00</b>	<b>5.80</b>	<b>4.00</b>	<b>4.90</b>	<b>48.70</b>	<b>67.20</b>	<b>\$100.00</b>	<b>\$30,975.00</b>

**Expenses:**

Travel	\$2,255
Court Fees	\$375
Service of Complain	\$90
Federal Express	\$66
Online legal research	\$11
<b>Total Expenses:</b>	<b>\$2,797</b>